

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

SECURE AXCESS, L.L.C.

Plaintiff,

v.

HP ENTERPRISE SERVICES, LLC

Defendant.

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CIVIL ACTION NO 6:15-CV-00208

JURY TRIAL DEMANDED

(Consolidated Lead Case)

**JOINT MOTION FOR ENTRY OF DOCKET CONTROL ORDER, DISCOVERY
ORDER, ESI DISCOVERY ORDER, AND PROTECTIVE ORDER**

Pursuant to the Court's October 7, 2015 Order and the Court's November 9, 2015 Order, Plaintiff Secure Axxess, LLC ("Secure Axxess") and consolidated Defendants HP Enterprise Services, LLC, Ericsson Inc., Fujitsu Network Communications, Inc., and NEC Cloud Communications America, Inc. ("Defendants") jointly move for the entry of the attached proposed Docket Control Order, Discovery Order, Electronically Stored Information Discovery Order ("ESI Order"), and Protective Order. The parties do not have any disputed issues regarding these proposed orders.

Respectfully submitted,



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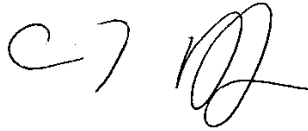
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and served via the Court's electronic filing system on all counsel who have consented to electronic service on this the 11th day of November, 2015.

A handwritten signature in black ink, appearing to read 'C7' followed by a stylized, cursive signature.

CHRISTIAN HURT